

NO. 5:18-CR-452-FL(1)
NO. 5:18-CR-452-FL(2)
NO. 5:18-CR-452-FL(3)
NO. 5:18-CR-452-FL(4)

JOINT MOTION TO CONTINUE
ARRAIGNMENT AND AMEND
SCHEDULDING ORDER

1. Defendants have been charged in a fifty-count Fourth Superseding Indictment filed on May 9, 2019. Discovery is voluminous, and includes recordings in a foreign language, transcript preparations of those recordings, numerous digital media such as phones and computers, and hundreds of

thousands of pages of records, and will require ongoing analysis of substantial financial records.

2. The parties propose to the Court a specific pre-trial schedule, attached as Exhibit 1 hereto, addressing various deadlines which would assist in a timely and efficient trial proceeding. Such deadlines would include those for final transcript preparations, designations of various portions of transcripts and recordings as trial exhibits, and for response and objections to such designations, deadlines for naming experts, as well as for pre-trial motions.

3. An extension of the scheduling deadlines is necessary for the effective assistance of counsel in the analysis of the case and adequate preparation of the matter for trial.

4. Counsel for the remaining defendants, Alexey and Olesya Timofeev, consent to the proposed schedule as applicable to their cases as well.

5. Defendants agree to waive any objections under the Speedy Trial Act, 18 U.S.C. § 3161(h) in relation to this proposed schedule.

A proposed Order is submitted with this joint motion.

Respectfully submitted, this 9th day of September, 2019.

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September, 2019, I electronically filed the foregoing **JOINT MOTION TO CONTINUE ARRAIGNMENT AND AMEND SCHEDULING ORDER** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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